

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA, :
Plaintiff, : CASE NO. 2:22-cr-00143
: JUDGE JAMES L. GRAHAM
vs. :
CHARLE ASUMADU, :
Defendant.

**MOTION TO EXTEND TIME TO FILE OBJECTIONS
AND FINAL PRESENTENCE REPORT**

Now comes Defendant who, through Counsel, hereby requests this Court to extend time to file objections and the final presentence report in this case by at least four weeks. The reasons for this request are set forth in full in the Memorandum in Support below.

Respectfully submitted,

/s/ Adam G. Burke
ADAM G. BURKE (0083184)
Attorney for Defendant.
625 City Park Ave
Columbus, Ohio 43206
(614) 280-9122
burke142@gmail.com

MEMORANDUM IN SUPPORT

On November 2, 2022, the above-named Defendant, Charles Asumadu entered a guilty plea on a bill of information to one count of Conspiracy to Commit Money Laundering a violation of Title 18, United States Code, Sections 1956 and 1957.

On the same day, this Honorable Court ordered that the Presentence Investigation Report to be submitted to the Court.

On December 7, 2022, Officer Schal Kline Boucher filed her initial Presentence Investigation Report. Presently, the Final PSR is due by January 23, 2023.

However, the undersigned Counsel has been unable to review the Intial PSR and provide objections to the same because Defense Counsel has been transitioning to a new law firm and was interrupted by the holidays.

Neither the Government nor the Probation Office opposes this requested extension.

For this reason, Defendant, through counsel respectfully requests that this Court extend time to submit objections and to file the final presentence report by at least four weeks.

Respectfully submitted,

/s/ Adam G. Burke
ADAM G. BURKE (0083184)
Attorney for Defendant.
625 City Park Ave
Columbus, Ohio 43206
(614) 280-9122
burke142@gmail.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a true copy of the foregoing Motion to Extend Time upon all parties of record by action of the Court's CM/ECF filing system on January 10, 2023.

/s/ Adam G. Burke
ADAM G. BURKE
Attorney for Defendant